

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

CIVIL CASE NO. 3:14-CV-91

KENNETH D. BELL, in his capacity as
court-appointed Receiver for Rex Venture
Group, LLC d/b/a ZeekRewards.com,

Plaintiff,

vs.

TODD DISNER, in his individual
capacity and in his capacity as trustee for
Kestrel Spendthrift Trust; TRUDY
GILMOND; TRUDY GILMOND, LLC;
JERRY NAPIER; DARREN MILLER;
RHONDA GATES; DAVID SORRELLS;
INNOVATION MARKETING, LLC;
AARON ANDREWS; SHARA
ANDREWS; GLOBAL INTERNET
FORMULA, INC.; T. LEMONT SILVER;
KAREN SILVER; MICHAEL VAN
LEEUWEN; DURANT BROCKETT;
DAVID KETTNER; MARY KETTNER;
P.A.W.S. CAPITAL MANAGEMENT
LLC; LORI JEAN WEBER; and a
Defendant Class of Net Winners in
ZEEKREWARDS.COM;

Defendants.

**MOTION TO SET ASIDE
JUDGMENT PURSUANT TO
RULE 60(b)(6)**

Movant, Lulu Yang, pursuant to Federal Rule of Civil Procedure 60(b)(6), moves this Court for entry of an order setting aside the Final Judgment entered against her on August 14, 2017. This Motion is supported by Movant's Memorandum ("Memorandum in Support of Movant's Motion to Set Aside Judgment"), submitted herewith. This Motion is further supported by the Declaration of Lulu Yang in

Support of Movant's Motion to Set Aside Judgment, and Exhibits attached thereto, attached as Exhibit A to the Memorandum.

WHEREFORE, Movant prays the Court to grant her Motion to Set Aside Judgment.

Respectfully submitted this 31st day of December, 2021.

/s/ William R. Terpening

William R. Terpening

N.C. Bar 36418

Tomi M. Suzuki

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the **MOTION TO SET ASIDE JUDGMENT PURSUANT TO RULE 60(b)(6)** was submitted via the CM/ECF system, which constitutes service on all parties.

This the 31st day of December, 2021.

/s/ William R. Terpening
William R. Terpening